

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Service Rules and Procedures to Govern the Use	)	IB Docket No. 05-20
Of Aeronautical Mobile Satellite Service Earth	)	
Stations in Frequency Bands Allocated to the	)	
Fixed Satellite Service	)	

**REPLY COMMENTS OF TELESAT CANADA**

1. Telesat Canada (“Telesat”) hereby submits the following reply to certain comments filed by other parties in the above captioned proceeding concerning rules and procedures to govern use of Aeronautical Mobile Satellite Service (“AMSS”) in frequency bands allocated to the Fixed Satellite Service (“FSS”).

2. In their joint comments, the Department of Justice, the Federal Bureau of Investigation, and the Department of Homeland Security, identify a need for a number of “operational capabilities” in support of public safety and/or national security services that satellite-based service providers or carriers should be able to provide through AMSS in these frequency bands, including:

“(8) Provide a dedicated service or reserve bandwidth (which can be accomplished through preemption protocols) to support the transmission and reception of emergency communications information to and from aircraft security elements, independent of passenger use”.<sup>1</sup>

While Telesat agrees that the public safety and national security matters raised in the Departments’ submission are of extreme importance to the general public, it must be noted that AMSS was only afforded secondary allocation in these bands at WRC-03, operating on a non-interference and no protection basis.

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<sup>1</sup> Comments of Department of Justice, including the Federal Bureau of Investigation, and the Department of Homeland Security, IB Docket No. 05-20 (July 5, 2005), at page 13.

3. In Telesat's view, provision of emergency or safety of life services in a non-protected band is not appropriate, particularly as it could create a false sense of security as the services may not be available when they are most needed.<sup>2</sup> Rather, such services should be provided through AMSS only in those frequency bands intended for AMSS priority services, where AMSS has the primary allocation. Furthermore, as it is expected that the spectrum requirements for such safety of life services dealing with security of air travel would be limited, Telesat believes that this requirement could be accommodated within the existing AMSS primary allocation bands.

4. A second matter that Telesat would like to comment on concerns signal interference from aircraft earth stations ("AES") terminals. The number and frequency of incidents of signal interference is growing and posing a larger threat to the overall economic health of the satellite industry. Telesat is therefore in basic agreement with PanAmSat's arguments supporting the Commission's proposal to require that AMSS operators track AES operations.<sup>3</sup> Telesat believes that both active and passive tracking information would be valuable in determination of sources of unknown interference. Furthermore, Telesat disagrees with the ARINC suggestion that retention of tracking data by AMSS operators for only 30 days would be sufficient for this purpose.<sup>4</sup> Due to the transient nature of this type of service, it is critical that this information be retained for a much longer period (i.e., the one year period as suggested by the Commission and as supported by others in this proceeding<sup>5</sup>, would be appropriate).

5. Finally, Telesat disagrees with the views expressed by ARINC that AMSS services should be granted the same level of flexibility as VSAT services in use of contention based protocol systems.<sup>6</sup> It should be noted that VSAT services are among the primary services of FSS, with a long history of operation in various FSS frequency bands. In contrast, AMSS services are a secondary allocation service in these bands and have not reached the level of maturity necessary to be allowed such flexibility.

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<sup>2</sup> See Comments of Telesat Canada, IB Docket No. 05-20 (July 5, 2005), at paragraph 15.

<sup>3</sup> See Comments of PanAmSat Corporation, IB Docket No. 05-20 (July 5, 2005), at 5.

<sup>4</sup> See Comments of ARINC Incorporated, IB Docket No. 05-20 (July 5, 2005), at 18.

<sup>5</sup> See Comments of PanAmSat Corporation, *ibid.*

<sup>6</sup> See Comments of ARINC Incorporated, *ibid.*, at 24.

Respectfully submitted,

Telesat Canada

A handwritten signature in black ink, appearing to be 'Ted H. Ignacy', is written over a horizontal line.

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